

# **Exhibit FF**

**To:** Meghan Gardler[meghan@mycred.io]; Alexandria Degree[degree@innreg.com]; Francesco Matteini[francesco@innreg.com]  
**From:** Dan Wheeler[dan.wheeler@mycred.io]  
**Sent:** Sun 9/22/2019 5:34:59 PM (UTC-04:00)  
**Subject:** RE: Marketing Process

Meghan, thank you. This is a very helpful inventory and the specific examples are helpful.

I will work with Degree and Francesco to come up with guidelines (probably in flowchart format) for the marketing department that will hopefully provide guidance to you and help you decide exactly which communications need compliance review.

In looking at these examples, we should start from the principle that any marketing communication that promotes “CredEarn” needs compliance review before it is released. For example, compliance needs to review the script for the CredEarn video that you sent. When we are marketing a product generally to US and non-US, we have to assume the most restrictive rules apply. In the US, CredEarn is a loan product and anytime we market a loan, we need to ensure the marketing materials include the right notices and otherwise comply with laws applicable to lending.

In addition to lending laws, we need to document that any statements of fact (for example, that all loans Cred makes are “fully collateralized” or that Cred has \$300 million in funding) are supported by verified facts.

Degree and Francesco, given the volume of marketing occurring, please move the guideline development to our top priority in compliance / licensing. Please strive to have a draft guideline to me by Wednesday this week. Let’s discuss Monday morning the form and content of the guidelines

Dan

**Daniel F. Wheeler**

General Counsel

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**From:** Meghan Gardler <meghan@mycred.io>

**Sent:** Friday, September 20, 2019 1:04 PM

**To:** Dan Wheeler <dan.wheeler@mycred.io>; Alexandria Degree <degree@innreg.com>; Francesco Matteini <francesco@innreg.com>

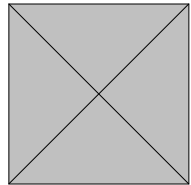
**Subject:** Marketing Process

Hi all,

This took me a bit of time to codify everything that I do on a weekly basis. I handle all aspects of marketing in general, but for the purposes of this document, this pertains solely to digital marketing, or “advertisements”. If I need to include events and conferences I can do that. I also only went into promotional emails if you need me to provide more clarity on transactional emails let me know.

[Please see the link here](#) and let me know if I need to elaborate further on any points.

Thank you,



Meghan Gardner

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